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8 **BEFORE THE**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **FOR THE CEMETERY AND FUNERAL BUREAU**  
11 **STATE OF CALIFORNIA**

12  
13 In the Matter of the Accusation Against:

Case No. A1 2018 32

14 **WESTWOOD HILLS MEMORIAL PARK**

15 2720 Cold Springs Road  
16 Placerville, CA 95667

**DEFAULT DECISION AND ORDER**

17 Certificate of Authority No. COA 135

[Gov. Code, §11520]

18 Respondent.  
19

20  
21 **FINDINGS OF FACT**

22 1. On or about November 29, 2018, Complainant Lisa Moore, in her official capacity as  
23 the Bureau Chief of the Cemetery and Funeral Bureau, Department of Consumer Affairs, filed  
24 Accusation No. A1 2018 32 against Westwood Hills Memorial Park (Respondent) before the  
25 Director of Consumer Affairs. (Accusation attached as Exhibit A.)

26 2. On or about May 1, 1950, the Cemetery and Funeral Bureau (Bureau) issued  
27 Certificate of Authority License No. COA 135 to Respondent. The Certificate of Authority was  
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1 in full force and effect at all times relevant to the charges brought in Accusation No. A1 2018 32  
2 and will expire on January 1, 2020, unless renewed.

3 3. On or about December 7, 2018, Respondent was served by Certified and First Class  
4 Mail copies of the Accusation No. A1 2018 32, Statement to Respondent, Notice of Defense,  
5 Request for Discovery, and Discovery Statutes (Government Code sections 11507.5, 11507.6,  
6 and 11507.7) at Respondent's address of record which, pursuant to Business and Professions  
7 Code section 971 and California Code of Regulations, title 16, section 2304, is required to be  
8 reported and maintained with the Bureau. Respondent's address of record was and is:  
9 2720 Cold Springs Road, Placerville, CA 95667.

10 4. Service of the Accusation was effective as a matter of law under the provisions of  
11 Government Code section 11505(c) and/or Business and Professions Code section 124.

12 5. Government Code section 11506(c) states, in pertinent part:

13 (c) The respondent shall be entitled to a hearing on the merits if the respondent  
14 files a notice of defense . . . and the notice shall be deemed a specific denial of all  
15 parts of the accusation . . . not expressly admitted. Failure to file a notice of defense  
16 . . . shall constitute a waiver of respondent's right to a hearing, but the agency in its  
17 discretion may nevertheless grant a hearing.

18 6. The Bureau takes official notice of its records and the fact that Respondent failed to  
19 file a Notice of Defense within 15 days after service upon them of the Accusation, and therefore  
20 waived their right to a hearing on the merits of Accusation No. A1 2018 32.

21 7. California Government Code section 11520(a) states, in pertinent part:

22 (a) If the respondent either fails to file a notice of defense . . . or to appear at  
23 the hearing, the agency may take action based upon the respondent's express  
24 admissions or upon other evidence and affidavits may be used as evidence without  
25 any notice to respondent . . . .

26 8. Pursuant to its authority under Government Code section 11520, the Director finds  
27 Respondent is in default. The Director will take action without further hearing and, based on the  
28 relevant evidence contained in the Default Decision Evidence Packet in this matter, as well as  
taking official notice of all the investigatory reports, exhibits and statements contained therein on  
file at the Director's offices regarding the allegations contained in Accusation No. A1 2018 32,

1 finds that the charges and allegations in Accusation No. A1 2018 32, are separately and severally,  
2 found to be true and correct by clear and convincing evidence.

3 9. The Director finds that the actual costs for Investigation and Enforcement are \$4,860.00 as  
4 of January 7, 2019.

5 DETERMINATION OF ISSUES

6 1. Based on the foregoing findings of fact, Respondent has subjected its Certificate of  
7 Authority License No. COA 135 to discipline.

8 2. The agency has jurisdiction to adjudicate this case by default.

9 3. The Director is authorized to revoke Respondent's Certificate of Authority based  
10 upon the following violations alleged in the Accusation which are supported by the evidence  
11 contained in the Default Decision Evidence Packet in this case:

12 a. Respondent violated Health and Safety Code section 8585, subdivision (a), by and  
13 through Business and Professions Code (Code) section 7711.1, subdivision (a), for unprofessional  
14 conduct, in that in or around April 2017, continuing to date, Respondent has failed to notify the  
15 Bureau of a change in ownership.

16 b. Respondent violated Code section 7653.6, by and through Code section 7711.1,  
17 subdivision (a), for unprofessional conduct, in that in or around April 2017, and continuing to  
18 date, Respondent has operated a licensed cemetery and failed to employ and designate a licensed  
19 manager as required pursuant to Code section 7653.6.

20 c. Respondent violated title 16 of the California Code of Regulations (CCR) section  
21 2337, subdivision (a), by and through Code section 7711.1, subdivision (a), for unprofessional  
22 conduct, in that in or around February 2018, Respondent failed to post a non-endowment care  
23 sign at the entrance of a cemetery.

24 d. Respondent violated Code section 7637.1, by and through Code section 7711.1,  
25 subdivision (a), for unprofessional conduct, in that in or around April 2017, continuing to date,  
26 Respondent's employees have engaged in unlicensed practice as cemetery brokers.

1 e. Respondent violated Health and Safety Code section 8277, by and through Code  
2 section 7711.1, subdivision (a), for unprofessional conduct, in that Respondent engaged in the  
3 improper execution of contracts.

4 f. Respondent violated Health and Safety Code section 7111, by and through Code  
5 section 7711.1, subdivision (a), for unprofessional conduct, in that in or around February 2018,  
6 Respondent's employees failed to get proper signature/authorization for interment, as required  
7 pursuant to Health and Safety Code section 7100.

8 g. Respondent violated Code section 7685.5, subdivision (b), by and through Code  
9 section 7711.1, subdivision (a), for unprofessional conduct in that in or around February 2018,  
10 Respondent failed to have the Bureau's current *Consumer Guide to Funeral & Cemetery*  
11 *Purchases* available to consumers.

12 h. Respondent violated Code section 7685.5, subdivision (c), by and through Code  
13 section 7711.1, subdivision (a), for unprofessional conduct, in that in or around April 2017, and  
14 continuing to date, Respondent has failed to provide consumers with a copy of the *Consumer*  
15 *Guide to Funeral & Cemetery Purchases*.

16 i. Respondent violated CCR section 2337, subdivision (b), by and through Code section  
17 7711.1, subdivision (a), for unprofessional conduct in that Respondent failed to include the  
18 Nonendowment Care Disclosure on its price lists.

19 j. Respondent violated Code section 119, subdivision (a), by and through Code section  
20 7711.1, subdivision (a), for unprofessional conduct, in that Respondent staff displayed or caused  
21 permits to be displayed, or had in his or her possession a canceled, revoked, suspended, or  
22 fraudulently altered license.

23 ORDER

24 IT IS SO ORDERED that Certificate of Authority License No. COA 135, issued to  
25 Respondent Westwood Hills Memorial Park, is revoked.

26 Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a  
27 written motion requesting that the Decision be vacated and stating the grounds relied on within  
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1 seven (7) days after service of the Decision on Respondent. The agency in its discretion may  
2 vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

3 This Decision shall become effective on March 3, 2019.

4 It is so ORDERED February 1, 2019

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7 RYAN MARCROFT  
8 DEPUTY DIRECTOR, LEGAL AFFAIRS  
9 DIVISION  
10 DEPARTMENT OF CONSUMER AFFAIRS

11 13393267.DOCX  
12 DOJ Matter ID:SA2018101997

13 Attachment:  
14 Exhibit A: Accusation  
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# Exhibit A

Accusation

(WESTWOOD HILLS MEMORIAL PARK)

1 XAVIER BECERRA  
Attorney General of California  
2 DAVID E. BRICE  
Supervising Deputy Attorney General  
3 PATRICIA WEBBER HEIM  
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7 *Attorneys for Complainant*

8  
9 **BEFORE THE**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
10 **FOR THE CEMETERY AND FUNERAL BUREAU**  
11 **STATE OF CALIFORNIA**  
12

13 In the Matter of the Accusation Against:

Case No. A1 2018 32

14  
15 **WESTWOOD HILLS MEMORIAL PARK**  
2720 Cold Springs Road,  
16 Placerville, CA 95667

**A C C U S A T I O N**

17 Certificate of Authority License No. COA 135

18 Respondent.  
19  
20

21 Complainant alleges:

22 **PARTIES**

23 1. Lisa M. Moore (Complainant) brings this Accusation solely in her official capacity as  
24 the Bureau Chief of the Cemetery and Funeral Bureau (Bureau), Department of Consumer  
25 Affairs.

26 2. On or about May 1, 1950, the Bureau issued Certificate of Authority License No.  
27 COA 135 to Westwood Hills Memorial Park (Respondent). The Certificate of Authority License  
28

1 was in full force and effect at all times relevant to the charges brought herein and will expire on  
2 January 1, 2019, unless renewed.

### 3 JURISDICTION

4 3. This Accusation is brought before the Director of the Department of Consumer  
5 Affairs (Director) for the Bureau, under the authority of the following laws. All section  
6 references are to the Business and Professions Code (Code) unless otherwise indicated.

7 4. Section 7686 of the Code states, in pertinent part, that the Bureau may suspend or  
8 revoke licenses, after proper notice and hearing to the licensee, if the licensee has been found  
9 guilty by the Bureau of any of the acts or omissions constituting grounds for disciplinary action.  
10 The proceedings under this article shall be conducted in accordance with Chapter 5 of Part 1 of  
11 Division 3 of Title 2 of the Government Code, and the Bureau shall have all the powers granted  
12 therein.

13 5. Code section 118, subdivision (b), provides that the suspension, expiration, surrender,  
14 or cancellation of a license shall not deprive the Director of jurisdiction to proceed with a  
15 disciplinary action during the period within which the license may be renewed, restored, reissued,  
16 or reinstated.

### 17 STATUTORY PROVISIONS

18 6. Code section 119 states, in pertinent part:

19 Any person who does any of the following is guilty of a misdemeanor:

20 (a) Displays or causes or permits to be displayed or has in his or her possession either  
21 of the following:

22 (1) A canceled, revoked, suspended, or fraudulently altered license.

23 (2) A fictitious license or any document simulating a license or purporting to be or  
24 have been issued as a license.

25 7. Code section 7637.1 states:

26 A person shall not engage in the business of, act in the capacity of, or advertise or  
27 assume to act as, a cemetery broker or cemetery salesperson in this state without first  
28 obtaining a license from the bureau.

8. Code section 7653.6 states, in pertinent part:



1 A cemetery licensed under this chapter shall at all times employ a licensed cemetery  
2 manager to manage, supervise, and direct its operations. Notwithstanding any other  
3 provision of this chapter, licensed cemeteries within close geographical proximity of  
each other may request the bureau to allow a licensed cemetery manager to manage,  
supervise, and direct the business or profession of more than one facility.

4 (a) Every cemetery shall designate a licensed cemetery manager to manage the  
5 cemetery, and shall report the designation to the bureau within 10 days of the  
6 effective date. Any change in the designated manager shall be reported to the bureau  
within 10 days.

7 9. Code section 7685.5 states:

8 (a) The bureau shall make available to funeral establishments and cemetery  
9 authorities a copy of a consumer guide for funeral and cemetery purchases for  
10 purposes of reproduction and distribution. The funeral and cemetery guide that is  
11 approved by the bureau, in consultation with the funeral and cemetery industries and  
any other interested parties, shall be made available in printed form and electronically  
through the Internet.

12 (b) A licensee shall prominently display and make available to any individual who, in  
13 person, inquires about funeral or cemetery purchases, a copy of the consumer guide  
for funeral and cemetery purchases, reproduced as specified in subdivision (a).

14 (c) Prior to the drafting of a contract for services, the licensee shall provide, for  
15 retention, the consumer with a copy of the consumer guide for funeral and cemetery  
purchases described in subdivisions (a) and (b).

16 10. Section 7711.1 of the Code states, in pertinent part:

17 Unprofessional conduct by any licensee or registrant or by any agent or employee of a  
18 licensee or registrant constitutes grounds for disciplinary action. Unprofessional  
19 conduct includes, but is not limited to, the following:

20 (a) Violating or attempting to violate, directly or indirectly, or assisting in or abetting  
21 the violation of this chapter and any regulation adopted thereunder, or of any federal  
22 or state law or regulation governing the disposition of human remains, operation of  
cemeteries or crematories, the sale of cemetery property, or the sale of crematory  
services or commodities.

23 11. Section 7711.2 states, in pertinent part:

24 The bureau may, upon its own motion, and shall, upon the verified complaint in  
25 writing of any person, investigate the actions of any person engaged in the business or  
26 acting in the capacity of a cemetery licensee, and may temporarily suspend or  
permanently revoke a license at any time where the licensee, within the immediately  
27 preceding three years, while a cemetery licensee in performing or attempting to  
perform any of the acts specified in this act, has been guilty of any of the following:

28 (a) Making any substantial misrepresentation.

.....  
1  
2 (i) Any other conduct, whether of the same or a different character than specified in  
this section, which constitutes fraud or dishonest dealing.

3 (j) The misrepresentations and false statements mentioned in this section also include  
4 misrepresentation and false statements as to other property than that which the  
cemetery licensee may be selling or attempting to sell.

5 12. Health and Safety Code Section 7111 states, in pertinent part:

6 A cemetery authority or crematory may make an interment or cremation of any  
7 remains upon the receipt of a written authorization of a person representing himself or  
8 herself to be a person having the right to control the disposition of the remains  
pursuant to Section 7100.

9 13. Health and Safety Code Section 8277 states, in pertinent part:

10 Every contract of a cemetery authority, including contracts executed in behalf thereof  
11 by a cemetery broker or salesperson, which provides for the sale by the cemetery  
authority of an interment plot or any service or merchandise, shall be in writing and  
12 shall contain all of the agreements of the parties.

13 14. Health and Safety Code Section 8585(a) states:

14 Whenever ownership of any cemetery authority is proposed to be transferred, the  
15 cemetery authority shall notify the Cemetery and Funeral Bureau in the Department  
16 of Consumer Affairs. A change in ownership, for purposes of this section, shall be  
17 deemed to occur whenever more than 50 percent of the equitable ownership of a  
18 cemetery authority is transferred in a single transaction or in a related series of  
19 transactions to one or more persons, associations, or corporations. The notice shall  
20 specify the address of the principal offices of the cemetery authority, and whether it  
21 will be changed or unchanged, and shall specify the name and address of each new  
owner and the stockholders. A person or entity that knowingly provides false  
22 information shall be subject to a civil penalty for each violation in the minimum  
23 amount of two thousand five hundred dollars (\$2,500) and the maximum amount of  
24 twenty-five thousand dollars (\$25,000). An action for a civil penalty under this  
25 provision may be brought by any public prosecutor in the name of the people of the  
26 State of California and the penalty imposed shall be enforceable as a civil judgment.

### 27 REGULATORY PROVISIONS

28 15. California Code of Regulations, title 16 (CCR), section 2326.3 states, in pertinent  
part:

.....

26 (c) Change of corporate officers, limited liability company members, or trustees of  
27 the endowment care fund, including change of name and/or address of any individual  
previously reported to the bureau, shall be reported within thirty (30) days of the  
28 change on bureau form 23-NC (1/16), Cemetery Notification of Change, which is  
hereby incorporated by reference, along with a filing fee of twenty-five dollars (\$25).

1 (d) Addition of corporate officers, limited liability company members, or trustees of  
2 the endowment care fund shall be submitted on bureau form 23-NC (1/16), Cemetery  
3 Notification of Change, which is hereby incorporated by reference, accompanied by  
4 bureau form 16-CA (rev. 1/16), Certification Affidavit, which is hereby incorporated  
5 by reference, for each person along with a filing fee of twenty-five dollars (\$25).

6 (e) A limited liability company shall notify the bureau within thirty (30) days of  
7 employing a bureau licensed employee or upon the resignation or termination of a  
8 bureau licensed employee on bureau form 23-LE (1/16), Bureau Licensed Employee,  
9 which is hereby incorporated by reference.

10 16. CCR section 2337 states:

11 (a) Signs.

12 (1) Entrance Signs. Each nonendowment care cemetery shall post a sign at each  
13 entrance. These signs shall be at least sixteen inches (16") high and twenty-four  
14 inches (24") wide and shall be prominently mounted upright thus being perpendicular  
15 to level ground. Each sign shall contain the following:

16 (A) A heading containing the words "NONENDOWMENT CARE" in black lettering  
17 at least four inches high.

18 (B) The phrase "This is a nonendowment care interment property" in black lettering  
19 at least one and one-quarter inches (1 1/4") height.

20 (2) Office Signs. Each nonendowment care cemetery shall post a sign in the office or  
21 offices where sales are conducted. These signs shall be at least eight inches (8") high  
22 and twelve inches (12") wide and shall contain the following:

23 (A) A heading containing the words "NONENDOWMENT CARE" in black lettering  
24 at least two inches (2") high.

25 (B) The phrase "This is a nonendowment care interment property" in black lettering  
26 at least three-fourths inch (3/4") high.

27 (b) Contracts, Literature, Etc. There shall be printed at the head of all contracts,  
28 literature, publications, etc., of nonendowment care cemeteries the following phrase:

"This institution is operated as a 'NONENDOWMENT CARE' Interment Property."

The lettering shall appear in a minimum of 10-point type and the words  
"NONENDOWMENT CARE" shall be in capital letters.

### **COST RECOVERY**

17. Code section 125.3 provides, in pertinent part, that the Board may request the  
administrative law judge to direct a licentiate found to have committed a violation or violations of  
the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
enforcement of the case.

**FACTUAL ALLEGATIONS**

18. On or about September 25, 2017, the Bureau received a complaint that Respondent owner died in April 2017, and a new manager had not been appointed.

19. On or around January 3, 2018, Respondent staff continued to post the cemetery manager license of the decedent, and the original Certificate of Authority License, which listed the decedent.

20. In or around February 2018, the Bureau received an additional complaint that similarly alleged that a new manager for Respondent had not been appointed, and Respondent was operating without proper licenses.

21. During a Bureau investigation in February and March 2018, a Bureau investigator discovered the following:

i. Respondent had removed the non-endowment care sign previously posted at the entrance of the cemetery;

ii. The staff selling property were all confirmed not to have licenses with the Bureau;

iii. The licensed decedent's information was posted, and decedent was listed as a manager;

iv. Price lists failed to contain the Nonendowment Care Disclosure;

v. The Bureau's current *Consumer Guide to Funeral & Cemetery Purchases* was not available for customer review and use;

vi. A random sample of files showed that deeds contained the stamped signature of the decedent, or were unsigned.

vii. Respondent failed to obtain interment authorizations in four previous inspections in 2006, 2010, 2013, and 2018, and continued to do so as of February 28, 2018.

22. During their investigation, the Bureau investigator also discovered that as early as September 2017, Respondent was served notice of their non-compliance with the law. A citation for non-compliance was issued to Respondent on November 13, 2017, and the Bureau provided another notice of non-compliance to Respondent on December 27, 2017.

///

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Failure to Properly Transfer Ownership)**

3 23. Respondent is subject to disciplinary action under Health and Safety Code section  
4 8585(a), by and through Code section 7711.1(a), for unprofessional conduct, in that in or around  
5 April 2017, continuing to date, Respondent has failed to notify the Bureau of a change in  
6 ownership, as more particularly set forth in paragraphs 18-22.

7 **SECOND CAUSE FOR DISCIPLINE**

8 **(Failure to Have a Licensed Cemetery Manager)**

9 24. Respondent is subject to disciplinary action under Code section 7653.6, by and  
10 through Code section 7711.1(a), for unprofessional conduct, in that in or around April 2017, and  
11 continuing to date, Respondent has operated a licensed cemetery and failed to employ and  
12 designate a licensed manager as required pursuant to Code section 7653.6, as more particularly  
13 set forth in paragraphs 18-22.

14 **THIRD CAUSE FOR DISCIPLINE**

15 **(Failure to Post Proper Entrance Signs)**

16 25. Respondent is subject to disciplinary action under CCR section 2337(a), by and  
17 through Code section 7711.1(a), for unprofessional conduct, in that in or around February 2018,  
18 the Respondent failed to post a non-endowment care sign at the entrance of a cemetery, as more  
19 particularly set forth in paragraph 21.

20 **FOURTH CAUSE FOR DISCIPLINE**

21 **(Engaging in Unlicensed Practice as Cemetery Brokers)**

22 26. Respondent is subject to disciplinary action under Code section 7637.1, by and  
23 through Code section 7711.1(a), for unprofessional conduct, in that in or around April 2017, and  
24 continuing to date, Respondent's employees have engaged in unlicensed practice as cemetery  
25 brokers, as more particularly set forth in paragraphs 18-22.

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1 **FIFTH CAUSE FOR DISCIPLINE**

2 **(Engaging in the Improper Execution of Contracts)**

3 27. Respondent is subject to disciplinary action under Health and Safety Code section  
4 8277, by and through Code section 7711.1(a), for unprofessional conduct, in that Respondent  
5 engaged in the improper execution of contracts, as more particularly set forth in paragraphs 18-  
6 22.

7 **SIXTH CAUSE FOR DISCIPLINE**

8 **(Failure to Have Proper Authorization for Interment)**

9 28. Respondent is subject to disciplinary action under Health and Safety Code section  
10 7111, by and through Code section 7711.1(a), for unprofessional conduct, in that in or around  
11 February 2018, Respondent's employees failed to get proper signature/authorization for  
12 interment, as required pursuant to Code section 7100.

13 **SEVENTH CAUSE FOR DISCIPLINE**

14 **(Failure to Properly Display Consumer Guide)**

15 29. Respondent is subject to disciplinary action under Code section 7685.5(b), by and  
16 through Code section 7711.1(a), for unprofessional conduct, in that in or around February 2018,  
17 Respondent failed to have the Bureau's current *Consumer Guide to Funeral & Cemetery*  
18 *Purchases* available to consumers, as more particularly set forth in paragraph 21.

19 **EIGHTH CAUSE FOR DISCIPLINE**

20 **(Failing to Provide Consumers with Copy of Consumer Guide)**

21 30. Respondent is subject to disciplinary action under Code section 7685.5(c), by and  
22 through Code section 7711.1(a), for unprofessional conduct, in that in or around April 2017, and  
23 continuing to date, Respondent has failed to provide consumers with a copy of the *Consumer*  
24 *Guide to Funeral & Cemetery Purchases*, as more particularly set forth in paragraphs 18-22.

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1 **NINTH CAUSE FOR DISCIPLINE**

2 **(Failure to Include the Nonendowment Care Disclosure)**

3 31 Respondent is subject to disciplinary action under CCR section 2337(b), by and  
4 through Code section 7711.1(a), for unprofessional conduct, in that Respondent failed to include  
5 the Nonendowment Care Disclosure on its price lists, as more particularly set forth in paragraph  
6 21.

7 **TENTH CAUSE FOR DISCIPLINE**

8 **(Display or Possession of a Canceled, Revoked, Suspended,  
9 or Fraudulently Altered License)**

10 32. Respondent is subject to disciplinary action under Code section 119(a), by and  
11 through Code section 7711.1(a), for unprofessional conduct, in that Respondent staff displayed or  
12 caused permits to be displayed, or had in his or her possession a canceled, revoked, suspended, or  
13 fraudulently altered license, as more particularly set forth in paragraphs 18-22.

14 **PRAYER**

15 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
16 and that following the hearing, the Director of Consumer Affairs issue a decision:

17 33. Revoking Certificate of Authority License No. COA 135, issued to Westwood Hills  
18 Memorial Park;

19 34. Ordering Westwood Hills Memorial Park to pay the Cemetery and Funeral Bureau  
20 the reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
21 Professions Code section 125.3; and,

22 35. Taking such other and further action as deemed necessary and proper.

23  
24 DATED: November 29, 2015 Lisa M. Moore

25 LISA M. MOORE  
26 Bureau Chief  
27 Cemetery and Funeral Bureau  
28 Department of Consumer Affairs  
Complainant

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